

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : No. 1:23-bk-00988-HWV  
UPTOWN PARTNERS, LP d/b/a :  
Residences at Governor's Square, : Chapter 11  
a/k/a Governor's Square Apartments :  
Debtor :  
:

**APPLICATION TO APPROVE THE EMPLOYMENT OF  
JOEL A. READY, ESQUIRE AND CORNERSTONE LAW FIRM  
AS SPECIAL COUNSEL TO THE DEBTOR AND TO ALLOW  
AN ADMINISTRATIVE CLAIM**

The Application of Uptown Partners, LP d/b/a Residences at Governor's Square, a/k/a Governor's Square Apartments (Debtor) by and through its attorneys, Cunningham, Chernicoff & Warshawsky, P.C., to Approve the Employment of Joel A. Ready, Esquire and Cornerstone Law Firm as Special Counsel to the Debtor and to Allow an Administrative Claim for fees and expenses incurred beginning May 3, 2023, is as follows:

1. On May 2, 2023, Debtor filed a Petition under Chapter 7 of the United States Bankruptcy Code.
2. On September 13, 2023, the Court entered an Order converting the case to a case under Chapter 11 of the Bankruptcy Code.
3. The Debtor is in possession of its property and as a Debtor-in-Possession.
4. In order that the Debtor have representation regarding pending criminal citations in the Dauphin County Court of Common Pleas, the Debtor requests that this

Honorable Court authorize the retention of Joel A. Ready, Esquire and Cornerstone Law Firm (collectively “Ready”) to represent the Debtor as special counsel. Ready has represented the Debtor pre-Petition in matters related to the criminal citations. Prior to and since the filing of the Petition, Ready has been performing services for the Debtor related to the criminal citations.

5. The Debtor has selected Ready because he has expertise in dealing with such matters.

6. Ready has performed services for the Debtor pre-Petition. Ready has also performed defense services for the Debtor beginning shortly after the Petition Date. Such services are for non-bankruptcy matters, relating to criminal defense matters. Such services represent administrative claims of the Debtor.

7. The professional services to be rendered by Ready include, but are not limited to, representation of the Debtor concerning criminal citations in the Dauphin County Court of Common Pleas, and related matters (the “Defense Services”).

8. Ready will not perform any services in connection with the actual bankruptcy case of the Debtor which would duplicate the services performed by general bankruptcy counsel for the Debtor.

9. Ready believes that it represents no interest adverse to the Debtor. Ready is not a creditor of the Debtor.

10. Ready further believes that it has no connection with Debtor's creditors as set forth on the Verification of Joel A. Ready, Esquire. Because Ready is being retained as special counsel, the disinterestedness standard does not apply.

11. The Debtor will be billed by Ready, with such bills to be paid based upon further Orders of the Court. All charges will be billed at the firm's standard hourly billing rates otherwise in effect for comparable work performed by the law firm, such rates currently being:

Attorneys	\$275.00
Paralegal	\$165.00

Fees and expenses charged and payments thereon will be subject to the approval of the Bankruptcy Court upon proper application, and subject to the provisions of 11 U.S.C. §330 and Rule 2016 of the Rules of Bankruptcy Procedure. The Debtor believes, and therefore avers, that Ready is qualified to serve as special counsel for the Debtor in these proceedings, and further believes that the rates to be charged thereby are fair and reasonable, and those customarily charged by Ready for such services.

12. For the reasons set forth above, the employment of Ready as Special Counsel to the Debtor regarding criminal citations in the Dauphin County Court of Common Pleas and related matters is necessary and should be approved.

**WHEREFORE**, Debtor prays that its employment of Joel A. Ready, Esquire and Cornerstone Law Firm, as set forth in this Application, to represent the Debtor as special counsel in matters involving criminal citations in the Dauphin County Court of Common

Pleas and related matters and to Allow an Administrative Claim for allowed fees, be approved by the Court, and that Debtor have such other and further relief as is just and proper.

Respectfully submitted:

CUNNINGHAM, CHERNICOFF  
& WARSHAWSKY, P.C.

By:           /s/ Robert E. Chernicoff            
Robert E. Chernicoff, Esquire  
Attorney I.D. No. 23380  
2320 North Second Street  
P. O. Box 60457  
Harrisburg, PA 17106-0457  
(717) 238-6570

Date: August 5, 2024

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	No. 1:23-bk-00988-HWV
UPTOWN PARTNERS, LP d/b/a	:	
Residences at Governor's Square,	:	Chapter 11
a/k/a Governor's Square Apartments	:	
	:	
Debtor	:	

**VERIFICATION OF JOEL A. READY, ESQUIRE AND CORNERSTONE LAW FIRM  
PURSUANT TO FED.R.BANKR.P. 2014, IN SUPPORT OF  
APPLICATION TO APPROVE EMPLOYMENT OF SPECIAL COUNSEL  
AND TO ALLOW ADMINISTRATIVE CLAIM**

I, Joel A. Ready, Esquire, declare under penalty of perjury, and in connection with the Chapter 11 case of Uptown Partners, LP, that the following facts are true and correct to the best of my knowledge, information and belief:

1. I am a member of Cornerstone Law Firm, LLC, 8500 Allentown Pike, Suite 3, Blandon, Pennsylvania.
2. Cornerstone Law Firm, LLC, has represented Winn Managed Properties, LLC aka WinnCo., listed as a creditor on the creditor's matrix. Cornerstone Law Firm, LLC's representation of this WinnCo. is not believed to be a conflict.
3. Cornerstone Law Firm, LLC has no connection to any party in the above-referenced Chapter 11 case, except as set forth in paragraph 2 above, including without limitation to the Debtor, its creditors, any other parties in interest, the United States Trustee, or any other person employed in the office of the United States Trustee, or any other party with actual or potential interest in this Chapter 11 case or their respective attorneys, accountants or financial advisors.
4. Cornerstone Law Firm, LLC has previously performed legal services for the Debtor and has been fully paid for such services. Cornerstone Law Firm, LLC has continued to perform services for the Debtor post-Petition.
5. The undersigned is not aware of any conflict or potential conflict relating to the employment of Cornerstone Law Firm, LLC as to its representation of the Debtor in this case.
6. I understand that monetary compensation to Cornerstone Law Firm, LLC for fees and expenses incurred in this case may be subject to further approval of this Court, after appropriate notice and hearing.
7. The factual statements set forth in this Verification have been made based on a personal review by me and our staff to the list of insiders and creditors of the Debtors. This effort did not reveal any potential conflicts.

I, Joel A. Ready, Esquire, verify under penalty of perjury under the laws of the Commonwealth of Pennsylvania and the United States of America, that the foregoing is true and correct.

Date: 7/26/24

By: Joel Ready  
Joel A. Ready Esquire  
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